

Exhibit C

Locals #799, #800 and #805 I.L.A.

I, STEPHEN KEFF 033-42-9250 805
 FULL NAME S.S. # LOCAL

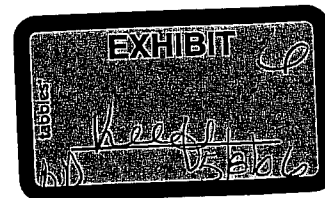
I pledge on my honor that I am available to the Longshore industry on a full-time basis and WORKING AT THIS CRAFT EXCLUSIVELY. I will show up to work on all starts at 6 A.M., 7 A.M., 8 A.M., 1 P.M., 6 P.M. and 10 P.M. seven (7) days a week except in cases of documented sickness, injury, vacation or bereavement. I further understand that, by signing this document, I am subject to removal from the gang and loss of all hiring hall privileges (jobs) for a period of six (6) months if I do not comply with this pledge. I acknowledge that I have received a copy of all Hiring Hall work rules.

Stephen Keff
 Signature

5/25/00
 Date

 Gang #/Terminal

 Position



Rev. 10/20/99

ENCLOSURE 6

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

C.A. NO.: 04-CV-11340DPW

* * * * *

STEPHEN KEEFE,

PLAINTIFF,

VS

LOCALS 805, INTERNATIONAL

LONGSHOREMEN'S ASSOCIATION,

AFL-CIO, ET. AL,

DEFENDANTS.

* * * * *

DEPOSITION OF STEPHEN KEEFE, taken on
behalf of the Defendants, pursuant to the
applicable provisions of the Federal Rules of
Civil Procedure, before Bernadette J. D'Alelio,
Notary Public and Court Reporter within and for
the Commonwealth of Massachusetts, at the
Offices of Mullen & McGourty, 52 Temple Place,
Boston, Massachusetts, on May 8, 2006,
at 10:01 a.m., as follows:

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1 A. Yes.
 2 Q. Do you still have your answers to the
 3 admissions in front of you?
 4 A. Yes.
 5 Q. Would you turn to Page 2, please.
 6 Do you see request Number 4 where it
 7 says, "Rule 37 of the hiring hall work rules
 8 for Local 799, 800, and 805 permits a six-month
 9 suspension from a gang or steady job for a
 10 member's violation of his pledge or due to his
 11 failure to appear before the rules committee
 12 when summoned."
 13 And you admitted that in your answers;
 14 is that right? I'm asking you to look at Page
 15 2 of the admissions.
 16 A. I know.
 17 Q. You admitted that to be a correct
 18 statement; is that right?
 19 A. Yes.
 20 Q. And so you also understood when you
 21 admitted that in January of 2006 that that
 22 admission was referring directly to what we've
 23 now marked as Exhibit 5 as the hiring hall
 24 rules, right?

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1 A. Yes.
 2 Q. At the bottom of Page 2, Request
 3 Number 7 on May 25, 2000, you signed a pledge
 4 sheet affirming your compliance with hiring
 5 hall rule 36 as it existed in May of 2000, and
 6 then you answer "admitted"; is that right?
 7 A. Yes.
 8 Q. And then in Request Number 8 in May of
 9 2000, you signed a pledge with Local 805. You
 10 were working exclusively at the craft of being
 11 a longshoreman. And you answered "admitted,"
 12 is that right, on Page 3?
 13 A. Yes.
 14 MR. MAHONEY: Mark that as the
 15 next exhibit, please.
 16 (Exhibit-6, Pledge Dated 5/25/00,
 17 marked for identification.)
 18 BY MR. MAHONEY:
 19 Q. We were just talking about the pledge
 20 that you signed in May of 2000, I'm going to
 21 show you what we now marked as Exhibit 6 to
 22 this deposition and ask if that is the pledge
 23 that you signed on May 25, 2000, or a copy of
 24 it?

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1 A. Yes.
 2 Q. When you read that, those words on
 3 Exhibit Number 6, you understood them; is that
 4 right?
 5 A. Yes.
 6 Q. Otherwise, you wouldn't have signed
 7 it, right?
 8 A. Yes.
 9 Q. You understood the capitalized,
 10 underlined phrase "working at this craft
 11 exclusively," otherwise you wouldn't have
 12 signed it, right?
 13 A. Yes.
 14 Q. John T. Clark & Son, they're contract
 15 stevedores and marine terminal operators, is
 16 that right, or they were?
 17 A. Yes.
 18 Q. What type of work did Local 805 do?
 19 A. Union work.
 20 Q. Are they stevedores?
 21 A. No.
 22 Q. They are not. Are they longshoremen?
 23 A. Yes.
 24 Q. What does a longshoreman do?

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1 A. A variety of things, unload ships, car
 2 jobs.
 3 Q. Drive cars off of ships. Anything
 4 else?
 5 A. Salt jobs.
 6 Q. What is a salt job?
 7 A. Unload salt passenger ships.
 8 Q. A longshoreman works down at the dock
 9 at a port, regardless of where it is, right?
 10 A. Yes.
 11 Q. And could you generally say that a
 12 longshoreman is a laborer who will unload all
 13 types of cargo from ships that is brought into
 14 the port; is that right?
 15 A. Yes.
 16 MR. MAHONEY: Let's mark this as
 17 the next exhibit, please.
 18 (Exhibit-7, Letter Dated 5/24/00,
 19 marked for identification.)
 20 BY MR. MAHONEY:
 21 Q. I'm going to show you, Mr. Keefe, what
 22 we've marked as Exhibit 7 and ask if you
 23 recognize this document?
 24 A. Yes.

11 (Pages 38 to 41)

DUNN & GOUDREAU

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